

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

FAIR ISAAC CORPORATION,

Court File No. 16-cv-1054
(WMW/DTS)

Plaintiff,

v.

**DECLARATION OF
PETER G. MULLER**

FEDERAL INSURANCE COMPANY,
an Indiana corporation, and ACE
AMERICAN INSURANCE COMPANY,
a Pennsylvania corporation,

Defendants.

I, Peter G. Muller, declare as follows:

1. I am the Technology Manager, Field Operations, Shared Services. I helped respond to FICO's Interrogatory No. 17 on behalf of Federal Insurance Company ("Federal") as it relates to the Commercial Underwriting Workstation ("CUW") application.

2. In or around July 2020, Chase McCarthy requested I assist him with attempting to refine the 2019 data. I was primarily responsible for working on the analysis of this data. My availability to work on this project was limited because in the summer of 2020 my spouse was admitted to the Cardiac Care Unit at a local hospital for treatment. As a result of this, I was out on PTO for approximately 10 days from the start of this project through early September 2020 due to my spouse's medical condition.

3. In addition to these family medical concerns, the project presented significant challenges. To refine the data and make it more accurate, we had to formulate and run

numerous queries in existing databases. These queries were sizeable and complex, and each one required several hours to process. When we initially began the process, the queries were repeatedly shut down by infrastructure because processing each query took hours and presented resource conflicts with production batch networks.

4. To resolve these issues, I batched the processing of the data into rows of 25,000 in order to see if I could complete the queries in blocks. Each block ran 3-4 hours and could only be run during off-hours (i.e., between 9pm – 6am weekdays, and Saturday and Sunday afternoon) to prevent impact to transactional processing in production.

5. The initial refinement process was completed in mid-August 2020. However, after completing this initial process we determined there were issues with the premium totals that required them to conduct a second analysis.

6. In or around September 1, 2020, I began the second data refinement. This time, I built an independent environment to run queries so I would not be impaired by running queries on production. However, this process presented infrastructure limitations. The non-production environments have less resource allocations and, as a result, require more time to complete. The second analysis was broken into 10 files each of which took roughly 3.5 hours to process.

7. The second analysis was completed in or around September 12, 2020.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: November 11, 2020

s/ Peter G. Muller

Peter G. Muller